

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

John Remelius, )  
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 )  
 Plaintiff, )  
 )  
 )  
 v ) Case No. 2015-cv- 553  
 )  
 )  
 Vaisala Inc., a Delaware Corporation, )  
 )  
 )  
 Defendant. )

## ORIGINAL COMPLAINT

1. This court has subject matter jurisdiction under 28 USC § 1331 over this case because it arises under the Fair Labor Standards Act of 1938 (FLSA), 29 USC 201, et seq.
2. Defendant, Vaisala, Inc., is a Delaware Corporation that is registered to do business in the State of Illinois and at all material times was engaged in interstate commerce.
3. Plaintiff, John Remelius, was employed by defendant from July 18, 2011 through November 20, 2014.
4. Plaintiff was assigned the title of “field engineer” and the requirements of this assignment as described by defendant are set forth on Exhibit 1 hereto.
5. Plaintiff, for the entire time of his employment by defendant, was required to and did submit weekly time records to defendant and he was required to work more than 40 hours per week.
6. During the entire term of his employment by defendant, plaintiff accumulated 1,432.5 hours of overtime for a total of \$61,988.75 that has not been paid.

7. Plaintiff brings this claim under the FLSA, 29 USC 216(b) for unpaid overtime compensation in the amount of \$61, 988.75 and liquidated damages in that same amount, along with his attorney's fees and costs.

8. Defendant's failure to pay overtime wages to plaintiff was willful in that defendant had actual knowledge of the overtime hours alleged in paragraph six above as plaintiff was required to submit the same and the practice of not paying overtime persisted over the entire period of plaintiff's employment.

Relief Requested:

- A. Plaintiff seeks unpaid overtime in the amount of \$61,988.75, and
- B. Plaintiff seeks liquidated damages in the amount of \$61,988.75, and;
- C. Plaintiff seeks his attorney's fees and costs.

Respectfully submitted,

JOHN REMELIUS, Plaintiff.

By s/G. Patrick Murphy

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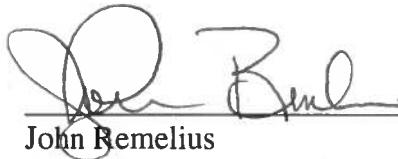
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I, John Remelius, state that I am the named plaintiff in this action and that I consent to the filing of this complaint by my attorney, G. Patrick Murphy.

Date: 5/13/15

Plaintiff,

  
John Remelius

## Field Service Engineer Role Profile Duties

1. Installation of RWIS Equipment:
  - a. Must be able to install Atmospheric Sensing equipment on a 30 ft. Fold-over tower including mounting of hardware and running of Power and Communications cables into Central Cabinet. Must be able to properly terminate all power and communications cables to Electronics (Remote Processing Unit) and program and verify all sensors using Software on RPU according to Vaisala Installation Standards.
  - b. Must be able to properly remove all Secured Mounting Bolts holding tower in upright position to enable lowering of tower for installation of Atmospheric Equipment. Once Atmospheric Equipment is installed, tower must be raised into upright position making sure it is properly secured using all mounting bolts.
  - c. Must be able to install Atmospheric equipment working at heights on a 6-10 ft. ladder while complying with all Vaisala Safety Requirements.
2. Preventative Maintenance:
  - a. Must be able to complete inspection of RWIS tower including mounting bolts, winch and cable assembly, grounding hardware and cabinet and mounting hardware.
  - b. Inspection of all Atmospheric Sensor hardware and cabling.
  - c. Calibration of all Atmospheric Sensors according to Vaisala Standards using Vaisala Standard Test Equipment.
  - d. Inspection and Calibration of Roadway Surface Sensors.
  - e. Testing of AC and DC power assembly units using Vaisala Standard Test Instruments.
  - f. Must be able to utilize Laptop with software to perform calibrations on all equipment and document each procedure.
  - g. Must be able to disconnect power and communication cables in order to perform calibrations and then return all power and communications to return system into working order.
3. Reactive Repairs:
  - a. Troubleshoot all Atmospheric and Roadway sensors using Vaisala Standard Test Instruments.
  - b. Must be able to divide entire systems into subparts to individually troubleshoot each part in order to find and replace the faulty component.
  - c. Must be able to disconnect power and communications wiring of faulty components and then re-wire new replacement components.
  - d. Must be able to remove faulty components including all Atmospherics and Electronic boards and replace/install new components.
  - e. Must be able to use laptop and software to assist in troubleshooting components and to program new components and verify correct operation.
4. Health and Safety:

EXHIBIT 1  
To Remelius  
Complaint

- a. Driving a Vaisala Service Vehicle equipped with approved Safety lights, must be able to safely navigate continuously changing traffic conditions and merge on and off the highway while safeguarding the motoring public.
- b. Must adhere to all Vaisala Safety practices including using Personal Protection Equipment while on the job site.
- c. Must adhere to all guidelines provided in Vaisala's North American Fleet Safety Manual.

5. Administrative Duties:

- a. Must be able to complete all required administrative paperwork.
  - 1. Time Sheets completed weekly.
  - 2. Expense Reports completed weekly.
  - 3. Service Requests completed within 5 Days.
  - 4. Site Visit Reports completed as needed.
  - 5. Quotes to Customers completed in a timely manner.
  - 6. Site Acceptance Testing reports completed in a timely manner.
  - 7. Commissioning Reports completed in a timely manner.